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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. 11-CR-0942-WHA
)	
v.)	
)	STIPULATION AND PROPOSED
)	ORDER CONTINUING HEARING
KEVIN DERRICOTT,)	
)	
Defendant.)	
)	

The parties respectfully submit this Stipulation and Proposed Order to request that the status conference scheduled for September 4, 2012, be continued until November 6, 2012, if the Court is available, and that time under the Speedy Trial Act be excluded until the new date. The parties hereby stipulate and agree to the following:

1. The defendant, Kevin Derricott, has been charged with conspiracy to commit bank and wire fraud, substantive wire fraud, and substantive bank fraud in the above-captioned indictment arising from his alleged participation in a scheme to acquire mortgage loans through fraud. The defendant made his initial appearance before the Court on July 10, 2012. At that appearance, Randy Sue Pollock, Esq., entered this case as the defendant's counsel.

2. On July 10, 2012, at the request of the parties, the Court continued the matter until

1 September 4, 2012 to allow Ms. Pollock to familiarize herself with this matter and to allow the
2 Government to prepare discovery. Since then, the Government has loaded a massive amount of
3 discovery on to a one-terabyte hard drive for Ms. Pollock. This discovery consists mostly of
4 bank documents relating to the various allegedly fraudulent loans attributable to the charged
5 scheme.

6 3. Given the large volume of discovery and its complex nature, the parties
7 respectfully submit that a continuance until November 6, 2012 is necessary in order to allow Ms.
8 Pollock time to review the discovery. Accordingly, the parties respectfully request that the
9 September 4, 2012 status conference be continued for this purpose. Should the Court grant this
10 request, the parties agree that excluding time under the Speedy Trial Act until the continued date
11 would serve the interests of justice by insuring the effective representation of counsel.

12 SO STIPULATED.

13 DATED: September 4, 2012

MELINDA HAAG
United States Attorney


14
15 By: /s/
16 W.S. Wilson Leung
Assistant United States Attorney

17 DATED: September 4, 2012

18 By: /s/
19 Randy Sue Pollock, Esq.
Counsel for Kevin Derricott

20 SO ORDERED.

21 DATED: September 4, 2012

22 
HON. WILLIAM ALSUP
United States District Judge
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